



NEVADA IRRIGATION DISTRICT

1036 W. Main Street, Grass Valley, CA 95945-5424
(530) 273-6185 ~ Fax: (530) 477-2646 ~ www.nidwater.com

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VIA ELECTRONIC MAIL

commentletters@waterboards.ca.gov

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Re: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the State Board:

The Nevada Irrigation District appreciates the opportunity to provide comments on the State Water Resources Control Board's Urban Water Conservation Workshop. Given the unprecedented precipitation a majority of the state has experienced, a discussion on whether Executive Order B37-16 and mandatory conservation measures should be extended seems to be prudent. The following comments are provided per question:

1. What elements for the existing emergency regulation, if any, should be modified?

Given the record setting pace to the start of the current water year, the emergency regulation put in place by the state is no longer necessary. Many portions of Northern California have received nearly a full season's rainfall totals with more in the forecast. Stress tests completed last year proving adequate water supplies by a majority of California water agencies have only been strengthened by the heavy precipitation totals this year. The District's customers are keenly aware that we have shifted our focus from drought and conservation to flood control management. Further discussion regarding drought and mandatory conservation measures would damage credibility with our customers and seems to be purely politically driven at this point.

Should the State Water Board wait until the hydrology for the current water year is known (April or later) before proposing adjustments to the current method for calculating conservation standards?

The District has been the beneficiary of a robust start to the water year. Precipitation sits at 228% of average, reservoirs are at 93% capacity (153% of average), and the electronic snowpack sensors show that the snowpack has recently rebounded to at

least average levels. Given that the District has received a nearly average year's precipitation total, waiting for late season hydrology is not necessary. With full reservoirs, the region no longer has the capacity to add to its water storage totals. Any additional precipitation will be sent into the already maxed river system and eventually to the ocean. Waiting until later in the water year will not provide any additional benefit to Northern California as our reservoirs will remain full.

Should the State Water Board allow suppliers to update or modify their conservation standard calculations (and if so, how)?

Conservation standards are no longer need in our region. A majority of agencies have demonstrated through last year's stress test that they had sufficient storage and supplies to adequately supply our customers over the next three years. The precipitation received to date only bolsters the stress test results and essentially extends the time frame in which adequate waters supplies will be available.

2. Should the State Water Board account for regional differences in snowpack, precipitation, and lingering drought impacts differently than under the current emergency regulation, if so, how?

Local conditions and control should be given a priority in all aspects of the regulation if extended. Given that major portions of the state are no longer hydrologically in drought, the State Water Board must relinquish its control and acknowledge the "wet" conditions and return to its more appropriate role as a water rights and water quality regulator.

3. Executive Order B37-16 requires the Board to develop a proposal to achieve a mandatory reduction in potable water use that builds off the mandatory 25 percent reduction in previous Executive Orders and lessons learned through 2016. The Board, however, is not required to act on this proposal. Should the Board act now, or later if conditions warrant, to a conservation standard structure like the one the Board adopted in February 2016 to achieve a mandatory reduction in water use?

The exceptional drought period has passed. The need for additional mandatory reductions is no longer needed. The State should utilize this reprieve from drought to support the local development of future conservation measures that allow for the utilization of drought resilient local supplies that have been developed through extensive investments by the local users, encourage conservation at the local level, and are not a challenge to water right laws.

The State Water Board continues to focus on ways to mandate conservation through punitive and mandatory measures. However, NID would like to point out that even without mandatory regulations, Districts customers conserved 26% in 2016 (as compared to 2013). It appears that conservation as a new way of life has taken hold.

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Heavy handed enforcement with customers who are doing their part seems unnecessary and has the potential to damage state and local conservation efforts that we have all worked hard to garner.

Respectfully Submitted,

NEVADA IRRIGATION DISTRICT

p.p. 

Remleh Scherzinger, P.E., MBA
General Manager

cc: Einar Mesch, General Manager Placer County Water Agency
Tom Cumpston, General Manager El Dorado Irrigation District
Ken Payne, General Manager, El Dordo County Water Agency
Rath Moseley, General Manager, Couth Feather Water and Power
George Barber, General Manger, Paradise Irrigation District